

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

MICHAEL COREY JENKINS, *et al.*

Plaintiffs,

v.

RANKIN COUNTY, MISSISSIPPI, *et al.*,

Defendants.

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**Civil Action No.
3:23-cv-374-DPJ-FKB**

**MOTION OF THE PLAINTIFFS FOR LEAVE TO
FILE AN AMENDED COMPLAINT**

Come now the plaintiffs, by and through counsel, pursuant to F.R.C.P. 15, and hereby move the Court for leave to file an Amended Complaint. In support of this motion plaintiffs aver as follows:

1. Plaintiffs filed their initial complaint in this matter on June 12, 2023.
2. At the time of filing of that complaint, the plaintiffs advised the Court and the named defendants of their intention to seek recovery from then unidentified responsible parties.
3. Based upon developments since that time, including but not limited to, the guilty pleas of the involved officers in criminal proceedings in both federal and state court regarding the incident with the plaintiffs, the plaintiffs have been able to identify additional parties responsible for the injuries which they suffered, as well as several other pertinent facts in support of their claims for relief. In further support of plaintiffs' motion, the Court is respectfully referred to the accompanying Memorandum of Points and Authorities.

CERTIFICATION OF COUNSEL

Prior to filing this motion, undersigned counsel sought the consent of counsel for

defendants Rankin County and Sheriff Bailey, Jason Dare, and he does not oppose the request herein.

Respectfully submitted on 11/20/ 2023 by:

/s/MALIK SHABAZZ, Esq./s/
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CERTIFICATE OF SERVICE

Attorneys for the Plaintiff do hereby certify that I have served a copy of the foregoing document via the ECF filing system on all counsel of record.

MALIK SHABAZZ, Esq.
ATTORNEY FOR PLAINTIFF